

LJF:AH

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-09-747

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 21, U.S.C., §§ 952(a)
and 960)

DUDLEY EARNEST JERRICK,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

NOAH ABBOTT, being duly sworn, deposes and states that he is a Special Agent with Immigration and Customs Enforcement, duly appointed according to law and acting as such.

Upon information and belief, on or about July 25, 2009, within the Eastern District of New York, defendant DUDLEY EARNEST JERRICK did knowingly and intentionally import a controlled substance into the United States from a place outside thereof, which offense involved a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

^{1/} Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. On the evening of July 25, 2009, defendant DUDLEY EARNEST JERRICK arrived at John F. Kennedy International Airport in Queens, New York, aboard Caribbean Airlines Flight No. BW424 from Georgetown, Guyana.

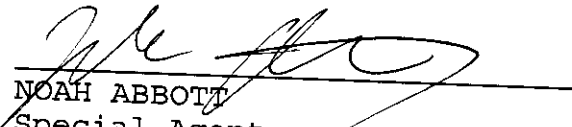
2. DUDLEY EARNEST JERRICK was selected by Customs and Border Protection Inspectors for a routine inspection. He presented two suitcases for inspection: a grey/black "Bi Boss" suitcase and a "Hays" suitcase. DUDLEY EARNEST JERRICK claimed ownership of the two suitcases.

3. When an inspector examined the "Bi Boss" suitcase, he found within it a large can of "Fernleaf Milk Powder." When the can was opened, it revealed a white, powdery substance with an odd odor. This white, powdery substance field-tested positive for cocaine.

4. When an inspector examined the "Hays" suitcase, he found within it another large can of "Fernleaf Milk Powder." When the can was opened, it revealed a white, powdery substance with an odd odor. This white, powdery substance field-tested positive for cocaine. At that point, DUDLEY EARNEST JERRICK was placed under arrest.

4. The gross weight of the white, powdery substance in the two cans is approximately 6,370 grams.

WHEREFORE, your deponent respectfully requests that the defendant DUDLEY EARNEST JERRICK be dealt with according to law.



NOAH ABBOTT
Special Agent
Immigration and Customs
Enforcement

Sworn to before me this
27th day of July, 2009

~~UNITED STATES MAGISTRATE JUDGE~~
~~EASTERN DISTRICT OF NEW YORK~~